

MEF:GMR
F. #2022R00612

FILED
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US DISTRICT COURT E.D.N.Y.
* AUGUST 24 2022 *
BROOKLYN OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

WILLIAM SWIFT,
Defendant.

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I N D I C T M E N T

Cr. No. 22-CR-388

(T. 18, U.S.C., §§ 875(c), 981(a)(1)(C),
2261A(2), 2261(b)(5), 2 and 3551 et
seq., T. 21, U.S.C., § 853(p), T. 28,
U.S.C., § 2461(c))

**COGAN , J.
BULSARA, M.J.**

THE GRAND JURY CHARGES:

COUNT ONE

(Transmission of Threats to Injure)

1. In or about and between February 2022 and June 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant WILLIAM SWIFT did knowingly and intentionally transmit in interstate and foreign commerce one or more communications containing one or more threats to injure the person of another, to wit: communications threatening injury to Jane Doe, John Doe-1, John Doe-2, John Doe-3 and John Doe-4, individuals whose identities are known to the Grand Jury.

(Title 18, United States Code, Sections 875(c), 2 and 3551 et seq.)

COUNT TWO

(Interstate Stalking)

2. In or about and between February 2022 and June 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant WILLIAM SWIFT did knowingly, intentionally and with the intent to injure, harass and intimidate Jane Doe, use (i) one or more interactive computer services, electronic communication

services and electronic communication systems of interstate commerce, and (ii) one or more facilities of interstate commerce to engage in a course of conduct that caused, attempted to cause and would reasonably be expected to cause substantial emotional distress to Jane Doe.

(Title 18, United States Code, Sections 2261A(2), 2261(b)(5), 2 and 3551 *et seq.*)

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT ONE**

3. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



Michael Buckley
FOREPERSON

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

By: 

Carolyn Pokorny
Assistant U.S. Attorney

F.#: 2022R00612
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of NEW YORK*

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

WILLIAM SWIFT,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 875(c), 981(a)(1)(C), 2261A(2), 2261(b)(5), 2 and
3551 et seq., T. 21, U.S.C. § 853(p), T. 28, U.S.C., § 2461(c))

A true bill.

Valerie Buckley

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 ____

Clerk

Bail, \$ _____

Gilbert Rein, Assistant U.S. Attorney (718) 254-6407